

MTSA/ISPS POLICY ADVISORY COUNCIL

December 6, 2005

Policy

Implementation of AWO's Amended ASP 61-05

Issue (58-05): What steps will users of the amended American Waterways Operators (AWO) Alternative Security Program (ASP) dated September 1, 2005 need to follow in order to be in compliance?

Policy:

On September 23, 2005, the amended American Waterways Operators (AWO) Alternate Security Program (ASP) was accepted and approved. All AWO members using the AWO ASP are required to operate under the amendments (dated September 1, 2005) by December 22, 2005. AWO provided its members with an explanatory memorandum outlining the changes to the AWO ASP.

After December 22, 2005, vessels subject to the MTSA requirements that are operated by AWO member companies using the AWO ASP can be expected to demonstrate the following :

- 1.) Implementation of the changes included in the amended AWO ASP dated September 1, 2005, and
- 2.) Completion of Appendixes C, D and E.

To clarify the requirements regarding needed documents, the amended AWO ASP contains more detailed information on the documents required to be kept onboard vessels and records that may be maintained at other locations. AWO ASP document requirements include the following:

1. “Appendix A: Vessel Security Assessment (VSA)” should be maintained by the Company Security Officer (CSO) in a shoreside office; a copy of the VSA is **not** required to be placed on board a towing vessel or barge.
2. A copy of “Appendix B: Vessel Security Assessment Report (VSAR)” should be placed on board each **towing vessel** using the AWO ASP.
3. The only security document required on board an **unmanned barge** is a letter signed by the vessel owner or operator stating that the barge is using the AWO ASP and certifying that the vessel is in full compliance with the AWO ASP.
4. Records related to security training, drills, and exercises should be maintained by either the **Company Security Officer or the towing vessel VSO**
5. A record of the completion of the annual internal audit must be maintained on board the **towing vessel**.
6. The **towing vessel’s** Vessel Security Officer (VSO) must retain Declaration of Security records as specified in the plan.
7. MARSEC Directives, which are instructions issued by the Coast Guard mandating specific security measures (e.g., visitor screening rates) for vessels and facilities that may be involved in a transportation security incident, must be obtained by the CSO. The CSO must ensure that all vessels are advised of and will comply with the relevant instructions in the Directives. MARSEC Directives can be obtained from the local Captain of the Port or cognizant District Commander. At present, AWO members are required to obtain and comply with MARSEC Directive 104-3 dated November 25, 2003.

Adherence to these requirements will be verified during security verification inspections conducted by Coast Guard inspectors.

The Coast Guard will work cooperatively with AWO members to conduct security verification inspections aboard vessels using the AWO ASP. Coast Guard inspectors will rely heavily on the AWO ASP “Appendix E: Vessel Security Implementation Checklist” to verify a vessel’s compliance with the AWO ASP. This checklist is specific to the AWO ASP and barge and towing vessel operations.

In general, if a Coast Guard inspector determines there is a need to amend the AWO ASP, such a request shall be routed to COMDT (G-MP) thru the chain of command for review. Deficient vessel specific implementation of the AWO ASP requirements (e.g. not fully implemented, and/or incorrectly implemented) do not require AWO ASP amendments. Coast Guard inspectors should work cooperatively with the CSO and/or VSO to address the deficiency.